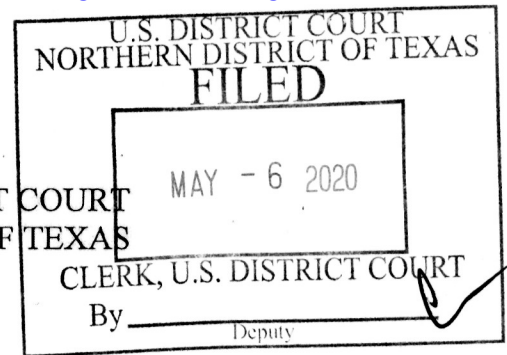


ORIGINAL



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

V.

JOSE CELBEY HERNANDEZ (1)
RENE S. RANGEL-MANJARREZ (2)

Criminal No.

3-20CR0183-M

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Smuggle Goods from the United States
(Violation of 18 U.S.C. § 371 (18 U.S.C. § 554 and 18 U.S.C. § 922(a)(1)(A))

From on or about January 1, 2020, until March 14, 2020, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants **JOSE CELBEY HERNANDEZ** and **RENE S. RANGEL-MANJARREZ**, did knowingly and willfully combine, conspire, confederate and agree together and with each other and with others known and unknown to the Grand Jury to commit offenses against the United States, to wit:

(A) to fraudulently and knowingly export and send from the United States, and attempt to export and send from the United States any merchandise, object and article contrary to law and regulation of the United States, that is, firearms and ammunition; and to receive, conceal, buy, sell, and in any other manner facilitate the transportation, concealment, and sale of said firearms and ammunition, prior to exportation, knowing the

same to be intended for exportation contrary to any law or regulation of the United States, in violation of 18 U.S.C. § 554;

(B) to willfully engage in the business of dealing in firearms, while not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, in violation of 18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D).

Manner and Means

The manner and means by which the defendants sought to accomplish the objects of the conspiracy included, among others, the following:

- a. Defendants **JOSE CELBEY HERNANDEZ** and **RENE S. RANGEL-MANJARREZ** worked together to purchase firearms from individuals and licensed dealers for the purpose of exporting them to individuals in Mexico.
- b. **JOSE CELBEY HERNANDEZ** would also look for firearms on the internet to purchase so they could be sent to Mexico.
- c. So as to avoid drawing undue suspicion to himself, **JOSE CELBEY HERNANDEZ** would recruit other individuals to purchase firearms on his behalf. **JOSE CELBEY HERNANDEZ** would provide the money to purchase the firearms and would pay the individuals for purchasing the firearms and turning them over to him.
- d. **RENE S. RANGEL-MANJARREZ** would also purchase firearms from licensed firearm dealers in his name and indicate the firearm was for him on the ATF Form 4473, even though the firearm was purchased on behalf of and

for **JOSE CELBEY HERNANDEZ**, who was going to send the firearm to Mexico.

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, in the Northern District of Texas, and elsewhere, at least one of the conspirators committed and caused to be committed, at least one of the following overt acts:

- a. On or about January 24, 2020, **JOSE CELBEY HERNANDEZ** purchased a Barrett rifle, model M82A1, .50 caliber, with serial number AA009636, knowing the firearm was going to be exported to Mexico.
- b. On or about January 31, 2020, **RENE S. RANGEL-MANJARREZ** purchased a Barrett rifle, model M82A1, .50 caliber, with serial number AA009613, knowing the firearm was going to be exported to Mexico. **RENE S. RANGEL-MANJARREZ** stated on the ATF Form 4473 that he was the actual buyer of this firearm, when in fact he was not. **RENE S. RANGEL-MANJARREZ** purchased the firearm on behalf of and for **JOSE CELBEY HERNANDEZ** knowing the firearm was going to be exported to Mexico.
- c. On or about March 3, 2020, **JOSE CELBEY HERNANDEZ** purchased a Barrett rifle, model M82A1, .50 caliber, with serial number AA009824, and a Jennings pistol, model J-22, .22 caliber, with serial number 328570, knowing the firearms were going to be exported to Mexico.
- d. On or about March 9, 2020, **JOSE CELBEY HERNANDEZ** purchased a

Barrett rifle, model M82A1, .50 caliber, with serial number AA009656, knowing the firearm was going to be exported to Mexico.

- e. On or about March 13, 2020, **RENE S. RANGEL-MANJARREZ** purchased a Barrett rifle, model 82A1, .50 caliber, with with serial number AA009624, from the Gun Boss in Pleasanton, Texas. **RENE S. RANGEL-MANJARREZ** stated on the ATF Form 4473 that he was the actual buyer of this firearm, when in fact he was not. **RENE S. RANGEL-MANJARREZ** purchased the firearm on behalf of and for **JOSE CELBEY HERNANDEZ** knowing the firearm was going to be exported to Mexico.
- f. On or about March 14, 2020, **JOSE CELBEY HERNANDEZ** and **RENE S. RANGEL-MANJARREZ** met with an undercover agent and purchased a Barrett rifle, model 82A1, .50 caliber, with serial number AA001056, knowing the firearm was going to be exported to Mexico.

All in violation of 18 U.S.C. § 371 (18 U.S.C. § 554(a) and 18 U.S.C. § 922(a)(1)(A)).

Count Two
Smuggling Goods from the United States
(Violation of 18 U.S.C. § 554 and 18 U.S.C. § 2)

On or about March 14, 2020, in the Northern District of Texas, the defendants, **JOSE CELBEY HERNANDEZ** and **RENE S. RANGEL-MANJARREZ**, aided and abetted by one another, fraudulently and knowingly receive, buy, and facilitate the sale of a Barrett rifle, model 82A1, .50 caliber, with serial number AA001056, prior to exportation, knowing the aforementioned item to be intended for exportation contrary to a law or regulation of the United States, that is, without first having obtained the required export license and authorization from the U.S. Department of State, in violation of, and contrary to, the Arms Export Control Act, 22 U.S.C. § 2778(b)(2) and (c), and the International Traffic in Arms Regulations, 22 C.F.R. §§ 121.3, 123.1 and 127.1.

In violation of 18 U.S.C. § 554 and 18 U.S.C. § 2.

Forfeiture Notice

[18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]

Upon conviction for violating 18 U.S.C. § 371 or 18 U.S.C. § 554 and pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), the defendants, **JOSE CELBEY HERNANDEZ** and **RENE S. RANGEL-MANJARREZ**, shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to a conspiracy to commit identified specified unlawful activities or a Section 554 offense. The property to be forfeited, includes, but is not limited to:

- 1) U.S. currency in the amount of \$8,142.00 seized from Jose Celbey Hernandez; and
- 2) U.S. currency in the amount of \$250.00 seized from Rene S. Rangel-Manjarrez.

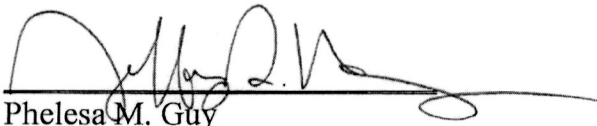
Upon conviction for violating 18 U.S.C. § 371 or 18 U.S.C. § 554 and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), defendants, **JOSE CELBEY HERNANDEZ** and **RENE S. RANGEL-MANJARREZ**, shall forfeit to the United States of America the firearm and ammunition involved in or used in the commission of such offense(s). The property to be forfeited includes, but is not limited to:

- 1) a Barrett rifle, model 82A1, .50 caliber, with serial number AA009624,
- 2) a Barrett rifle, model 82A1, .50 caliber, with serial number AA001056,
- 3) a Rick Island Armory pistol, model M1911A, caliber .380, serial number RIA2009080;
- 4) a ATI pistol, model 1911A, serial number ML134265; and
- 5) any ammunition and/or magazines found in or with the above firearms.

A TRUE BILL.


FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY


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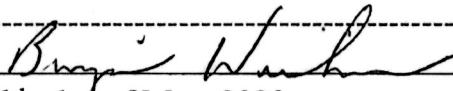
18 U.S.C. § 554 and 18 U.S.C. § 2
Smuggling Goods from the United States
(Count 2)

18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)
Forfeiture Notice

2 Counts

A true bill rendered

AMARILLO



FOREPERSON

Filed in open court this 6th day of May, 2020.

Defendant in Federal Custody since 03/14/2020

Alec Ann Reno

UNITED STATES MAGISTRATE JUDGE

Magistrate Court Number: 3:20-MJ-257-BK